

GIERBOLINI & CARROLL LAW OFFICES, P.S.C.
Miguel E. Gierbolini, Esq.
Courtney R. Carroll, Esq.

Statement of Account

Representation of The Financial Oversight and Management Board for Puerto Rico
("FOMB") Senate complaint litigation,
In re: The Financial Oversight and Management Board for Puerto Rico,
PROMESA Title III No. 17-BK3283-LTS
In re: The Financial Oversight and Management Board for Puerto Rico
v. Hon. Thomas Rivera-Schatz
(official capacity as a representative of Senate of Puerto Rico),
Adversary No. 19-00014

March 2019

DATE	ACTION	TIME	LAWYER
03/01/19	Analyze and review letter from counsel for Senate President in response to letter of Feb. 27, 2019. (1.0)	1	CRC
03/01/19	Review letter from C. Aliff, attorney from office of Aldarondo in response to 2/27 letter and compare with our (FOMB) stance from prior requests to assess steps to pursue. (1.0) Review and analyze vis a vis earlier requests, documents in support of letter included thereto. (1.5)	2.5	MEG
03/03/19	Analyze email communication from Guy Brenner of Proskauer ("GB") to FOMB team re: developments and analysis of letter from counsel for Senate President. (0.6) Analyze email communication Jaime El Koury ("JEK") of FOMB re: analysis of letter. (0.2)	.8	CRC
03/03/19	Review email from Guy Brenner related to analysis of March 1 letter and steps forward as they relate to the pending litigation. (0.7) Review letter sent to Senate and pertinent parts of complaint filed. (0.5)	1.2	MEG
03/04/19	Analyze email from JEK to FOMB team re: next steps in analyzing response from Senate vis a vis FOMB request for documents (0.3); review responses from members of FOMB team with further comments and questions related to response. (0.4)	.7	CRC
03/06/19	Analyze email from Jim Feltman of Duff and Phelps ("JF") re: analysis of Senate response in letter compared to FOMB request for information.	.3	CRC
03/06/19	Review email from J. Feltman assessing from auditor's point of view compliance with request for documents as proposed in attorney Aliff's March 1 letter. (0.4)	.4	MEG
03/07/19	Analyze email from Eric Hornung of Duff and Phelps re: letters providing access and consent letter form and documents in light to possibly for finalizing agreement with Senate re: response to request for documents. (0.3) Analyze letter from GB to FOMB team re: letter to Senate's counsel in response to their letter of March 1, 2019. (0.3)	.6	CRC

DATE	ACTION	TIME	LAWYER
03/07/19	Review email from auditors related to access letter to First Bank. (0.3) Review letter to First Bank from FOMB. (0.3) Review email from Brenner to Aliff related to response to March 1 letter and steps forward on cooperation. (0.3)	.9	MEG
03/08/19	Analyze email from Senate counsel T.Conf with Proskauer and O'Neill teams, JEK from FOMB to discuss current status regarding filing of complaint in adversary proceeding against Senate with regards to compliance with FOMB access to documents and financial information, service of process on defendant, possible schedule going forward, possible fast track before court, other strategic issues.	.6	CRC
03/08/19	Review response from attorney Aliff to March 7 letter from Brenner and consider outstanding issues related to unfettered access to accounts. (0.4). Review internal email from Brenner regarding Aliff's letter and position and suggested response. (0.3)	.7	MEG
03/09/19	Review email from Feltman to Sebastián Negrón related to steps to pursue in light of cooperation. Response email from J. El Koury. (0.3)	.3	MEG
03/09/19	Analyze email from Sebastián Negrón of FOMB related to steps to pursue in light of cooperation from Senate; response email from J. El Koury. (0.3)	.3	MEG
03/13/19	Review email from G Brenner related to merits of permitting extension to defendant for answer of Adversary Complaint. (0.3)	.3	MEG
03/15/19	Review motion filed for extension (0.3)	.3	MEG
03/15/19	Review motion filed for extension of time for Senate to answer adversary complaint (0.3). Read order granting motion for extension of time (0.2)	.5	CRC
03/30/19	Review email from Jennifer Roche of Proskauer ("JR") related to letter to bank and proposed Joint Stipulation. Draft email in response.	.7	MEG
03/30/19	Analyze email from JR and attached proposed letter to bank related to access of accounts and proposed Joint Stipulation. (0.3) Provide comments to MEG to include in response. (0.2)	.5	CRC
03/31/19	Review proposed letter to First Bank and review earlier letters to conform to latest. Review stipulation. Prepare email to J. Roche with comments and suggest changes.	1.8	MEG
03/31/19	Analyze proposed letter to First Bank. (0.4) Analyze proposed stipulation. (0.4) Provide comments to MEG to include in response to GB and JR with comments (0.7)	1.5	CRC
TOTAL HOURS		15.6	

FEES

Initials	Name	Position	Total time	Rate per hour	Total amount
CRC	Courtney R. Carroll	partner	6.5	240	\$1560
MEG	Miguel E. Gierbolini	partner	9.1	240	\$2184
TOTAL			15.6		\$3744.